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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
**Pro Se Non-Prisoner Complaint Form**

2011 DEC -9 PM 2: 08

[Enter the full name of the plaintiff in this action]

ERMA FRAZIER

) Civil Action No.

) (to be assigned by Clerk)

v.

[Enter the full name of each defendant in this action. If possible, please list only one defendant per line.]

Angela Repass  
Melissa Smith  
Regina Kelly  
Karol Seiler  
David Repass  
Salvation Army) DHQ  
Regina DAVIS

If allowed by statute, do you wish to have a trial by jury? Yes ☒ No ☐

[If any answer requires additional space, please use additional paper and attach hereto.]

**I. PREVIOUS LAWSUITS**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ☐ No ☒

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet of paper using the same outline.]

1. Parties to this previous lawsuit:

Plaintiff: \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court: \_\_\_\_\_

(If federal court, name the district; if state court, name the county)

3. Docket Number: \_\_\_\_\_
4. Name(s) of Judge(s) to whom case was assigned: \_\_\_\_\_
5. Status of Case: \_\_\_\_\_  
(For example, was the case dismissed? Settled? Appealed? Still Pending?)
6. Date lawsuit was filed: \_\_\_\_\_
7. Date of disposition (if concluded): \_\_\_\_\_
- C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?
- Yes \_\_\_\_\_ No ☒

## II. PARTIES

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

- A. Name of Plaintiff: ERMA FRAZIER
- Address: 129 LAIN ST.

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: DAVID & ANGELA REPASS
- Address: 322 GAYLE AVE. Aiken SC 29801

- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

Melissa Smith / 604 PARK AVE. Aiken SC  
Regina Kelly / 501 Archdale Dr. Charlotte NC  
Harol Seiler / 501 Archdale Dr. Charlotte NC 28273  
Regina Davis / 1424 N.E. Express Way Atlanta, Ga. 30329

## III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved.

Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

I was targeted by those defendants named herein by race and age discrimination. There has been several instances where several minorities have been terminated and just as I feel as though I was choose due to my race and age. I was the shelter Monitor, I've been on my job for 10-years and until our new captain Repass (David + Angela) arrived I had no issues. If a client lied on me or not I was never asked if I did it or not I was just written up. I was written up the first time suspended and fired the second time. I had a white co-worker who

## III. STATEMENT OF CLAIM - continued.

came in completely intoxicated with drugs on alcohol the captain came to the building and had to call her boyfriend to come and get her because she wasn't able to drive herself. My boss Mrs. Betty Kay Miles was terminated in experience i was the only person qualified to fill that position without a degree. I am 58 years old a black lady whose been on my job for 10 years, they never posted the job opening they never asked me about accepting the position. Within an hour of Mrs. Miles being fired, Melissa Smith who has no experience dealing with the shelter nor does she have a degree was appointed my new boss as shelter director / program director. I went through the chain of command with Mrs. Davis who called Mrs. Kelly and gave her the heads up about my concerns. Mrs. Davis said her boss would like to hear what i told her and that she would call me back instead she gave my information to Mrs. Kelly because as soon as i walked into the meeting Mrs. Kelly said oh yes Mrs. Davis did call me, saying that you call her. I had white co-workers who were treated better than myself.

**IV. RELIEF.**

*State briefly and exactly what you want this court to do for you.*

I would like my job back with full compensation and my 10 years seniority and a full apology. And those responsible terminated. I would also like a pay rate increase that would reflect 10-years of fair annual pay, cost of living raise(s).

***I declare under penalty of perjury that the foregoing is true and correct.***

Signed this 08 day of DEC., 20 11.

Emma Drazier  
Signature of Plaintiff